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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE CEMENT  
MASONS AND PLASTERERS JOINT  
PENSION TRUST; BOARD OF TRUSTEES  
OF THE CEMENT MASONS AND  
PLASTERERS HEALTH AND WELFARE  
TRUST; BOARD OF TRUSTEES OF THE  
CEMENT MASONS AND PLASTERERS  
VACATION SAVINGS PLAN TRUST;  
BOARD OF TRUSTEES OF THE OPERATIVE  
PLASTERERS AND CEMENT MASONS  
INTERNATIONAL ASSOCIATION LOCAL  
797 APPRENTICE AND JOURNEYMAN  
TRAINING TRUST; BOARD OF TRUSTEES  
OF THE OPERATIVE PLASTERERS AND  
CEMENT MASONS INTERNATIONAL  
ASSOCIATION TRAINING FUND,

Plaintiffs,

vs.

CAL ELECTRO INC., a California corporation;  
DOES 1-10 & ROES 1-10,

Defendants.

CASE NO.: 2:23-cv-01065-RFB-  
EJY

**STIPULATION TO DISCLOSE  
PAYROLL RECORDS AND TO  
STAY CASE AS TO  
DEFENDANT CAL ELECTRO  
INC. FOR A PERIOD NOT TO  
EXCEED 60 DAYS**

IT IS HEREBY STIPULATED AND AGREED between the Parties to this  
Stipulation (Plaintiffs and Defendant Cal Electro, Inc. ("CAL")), as follows:

1           1.       CAL, acting through its duly-appointed President, E. Robert Meissner,  
2 acknowledges that it was served with a copy of the Summons and Complaint in this action on  
3 July 27, 2023, as shown by the Affidavit of Service filed with the Court (ECF No. 5);

4           2.       CAL has not yet filed an answer, responsive pleading, or otherwise appeared  
5 in this action;

6           3.       CAL acknowledges that one form of relief sought by the Plaintiffs in this Case  
7 is an Order compelling CAL to disclose to Plaintiffs certain information, including payroll  
8 records covering CAL's operations for the for the time period of August 1, 2020 through  
9 June 30, 2022 (the "Records");

10          4.       CAL has not disclosed the Records to the Plaintiffs and declares that it prefers  
11 to promptly and informally disclose the Records to Plaintiffs' counsel rather than appearing  
12 immediately in the Case and disclosing the Records through formal discovery proceedings;

13          5.       The Parties have therefore executed this Stipulation intended to stay the Case  
14 as to CAL for a period of not more than sixty (60) days from the date on which the fully  
15 executed Stipulation is filed by Plaintiffs with the Court (the "Stay"), during which period of  
16 time CAL shall disclose the Records to Plaintiffs' counsel and Plaintiffs shall endeavor to use  
17 the Records to complete a compliance review of CAL's payroll practices;

18          6.       While the Parties agree that Plaintiffs may cause the Stay to terminate early by  
19 notifying CAL of Plaintiffs' desire to terminate the Stay in an email sent to E. Robert  
20 Meissner (cyndel@calelectroinc.com), the Stay may be extended beyond sixty (60) days only  
21 by written Order of the Court;

22          7.       Upon approval of this Stipulation by the Court, the Stay proposed by the  
23 parties shall be in effect for up to sixty (60) calendar days after the date on which this  
24 Stipulation is filed by Plaintiffs, and while the Stay remains in effect, CAL shall have no  
25 obligation to appear, answer or otherwise respond to the Complaint;  
26  
27  
28

1 8. CAL shall file its answer or otherwise respond to the Complaint not later than  
2 twenty one (21) days following the date on which the Stay terminates; and

3 9. CAL reserves all rights, claims, and defenses in this action.  
4

5 **ORDER**

6  
7 Good cause appearing, IT IS SO ORDERED.  
8

9 DATED and done this \_\_\_\_ day of \_\_\_\_\_, 2023.  
10

11  
12 \_\_\_\_\_  
13 UNITED STATES DISTRICT COURT JUDGE  
14

15  
16  
17 [PARTY SIGNATURES FOLLOW]  
18

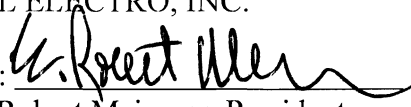
19 Dated: September \_\_\_\_\_, 2023.

20 CHRISTENSEN JAMES & MARTIN

21 By: \_\_\_\_\_  
22 Laura J. Wolff, Esq.  
23 Attorneys for Plaintiffs *Southern*  
24 *Nevada Cement Masons Trusts*

Dated: September 12, 2023.

CAL ELECTRO, INC.

21 By:   
22 E. Robert Meissner, President  
23 Email: bobm@calelectroinc.com  
24 Cell: 530-510-0069

1 8. CAL shall file its answer or otherwise respond to the Complaint not later than  
2 twenty one (21) days following the date on which the Stay terminates; and

3 9. CAL reserves all rights, claims, and defenses in this action.  
4

5 **ORDER**

6  
7 Good cause appearing, IT IS SO ORDERED.

8  
9 DATED and done this 22 day of September, 2023.  
10



11  
12 \_\_\_\_\_  
13 UNITED STATES DISTRICT COURT JUDGE  
14  
15  
16

17 [PARTY SIGNATURES FOLLOW]  
18

19 Dated: September 20, 2023.

Dated: September \_\_\_\_\_, 2023.

20  
21 CHRISTENSEN JAMES & MARTIN

CAL ELECTRO, INC.

22 By: Laura J. Wolff

By: \_\_\_\_\_

23 Laura J. Wolff, Esq.  
24 Attorneys for Plaintiffs *Southern*  
*Nevada Cement Masons Trusts*

E. Robert Meissner, President  
Email: \_\_\_\_\_  
Cell: 530-510-0069